

REMARKS

In the Official Action mailed **30 December 2010**, the Examiner reviewed claims 1, 5-9, 13-16, 21-24, 35-37, and 41-43. Examiner rejected claims 1, 5-9, 13-16, 21-24, 35-37, and 41-43 under 35 U.S.C. § 112. Examiner rejected claims 1, 8-9, 16-17, 24, and 41-43 under 35 U.S.C. § 103(a) based on Danknick et al. (U.S. Patent No. 6,021,429, hereinafter “Danknick”) in view of Eatough (U.S. Pub. No. 2003/0050955, hereinafter “Eatough”). Examiner rejected claims 34-37 under 35 U.S.C. § 103(a) based on Danknick and Eatough in view of George (U.S. Patent Number 7,143,108, hereinafter “George”). Examiner objected to claims 5-7, 13-15, and 21-23 as being dependent upon a rejected base claim, but pointed out that these claims would be allowable if rewritten in independent form.

Interview Summary

In a phone interview, Examiner and Applicant discussed the claimed embodiments in view of the cited art. More specifically, Applicant described the distinctions between the claimed embodiments and the “list manager” described by Danknick. No agreement was reached.

Rejections under 35 U.S.C. § 112

Examiner rejected claims 1, 5-9, 13-16, 21-24, 35-37, and 41-43 under 35 U.S.C. § 112. More specifically, Examiner rejected claim 1 under 35 U.S.C. § 112, arguing as follows:

As to claim 1, it recites “**a second client**” in line 3. There is no claim limitation of “a first client.” It is not clear to the examiner how second client exist when there is no first client. As to claim 1, it recites “**a multicast response**” in line 5. It also recites “a multicasted response” in line 8. It is unclear to the examiner whether these are referring to the same multicast response. Claim 1 recites the limitation “**the multicast query**” in line 5. There is insufficient antecedent basis for this limitation

in the claim. Claims 9 and 17 also have same deficiency. All the dependent claims have same deficiency of their base claims.¹

Applicant has amended the indicated claims to clarify the claimed embodiments. Because the amended claims meet the statutory requirement, Applicant respectfully requests the withdrawal of the rejection under 35 U.S.C. § 112.

Rejections under 35 U.S.C. § 103

Examiner rejected claims 1, 8-9, 16-17, 24, and 41-43 under 35 U.S.C. § 103(a) based on Danknick in view of Eatough. More specifically, in rejecting independent claims 1, 9, and 17 in the instant application, Examiner argued as follows (using the rejection of claim 1 as exemplary):

As to claim 1, **Danknick teaches** a method for invalidating a resource record in a local cache at a client computer system within a network, comprising: receiving a message from a second client querying a device; locating a second resource record associated with the second device; waiting for a response to the multicast query; and if after a pre-determined number of queries the response to the query is not received in the pre-determined amount of time, invalidating the second resource record (Column 8, lines 1-Column 9, lines 8).²

Applicant respectfully disagrees with this rejection. Although describing a network device that can be configured to function as a “list manager,” Danknick nowhere describes the claimed embodiments.

In the Danknick system, a device on a local-area network (LAN) can be configured in one of two ways -- either as a “list manager” for the LAN or as a “slave device” on the LAN:

The present invention addresses the foregoing need by controlling a network device on a LAN to operate as a list manager for the LAN, i.e., to

¹ see office action, page 2

² see *id.*, page 3

maintain a list of device addresses for the LAN, and to operate as a slave on the LAN, i.e., to provide its device address to another device on the LAN which is operating as the list manager. By controlling a device on the LAN to maintain a list of device addresses for the LAN, the present invention is able to alleviate the need for a file server to maintain such a list;³ and

The system determines whether a list manager is operating on the LAN, and controls the network device to operate as a slave on the LAN when it is determined that a list manager is operating on the LAN. The system controls the network device to operate as the list manager for the LAN when it is determined that no list manager is operating on the LAN.⁴

In the Danknick system, when a device is configured as a list manager, the device “creates and stores a list of devices” and provides other devices with the stored list of devices.⁵ For example, Danknick provides the following explanation:

If, on the other hand, NEB 2 receives the device address of the other network device, processing proceeds to step S511 in which NEB 2 **adds the device address of that other network device to the list of device addresses** in NEB 2. The device address is preferably added to the bottom of the list, although it may be added elsewhere as desired;⁶

Regarding the list of device addresses, a list manager on LAN 1 (which may or may not be NEB 2) maintains a list of device addresses from other devices on LAN 1. The list typically includes device addresses and corresponding device identification information for each device address ... Examples of device addresses and identification information **stored in a memory** on NEB 2 are shown in FIG. 8;⁷ and

In step S520 NEB 2 determines whether a peripheral on LAN 1, such as PC 26, has requested the list of device addresses stored in NEB 2. If, in step S520, NEB 2 determines that a peripheral has requested its list of device addresses, NEB 2 **provides the peripheral with the list of device addresses** in step S521.⁸

3 see Danknick, col. 1, lines 41-50

4 see *id.*, col. 1, lines 61-66

5 see *id.*, FIG. 5B, elements S506 and S521, and cols. 9-12

6 see *id.*, col. 10, lines 15-24

7 see *id.*, col. 7, line 57-col. 8, line 6

8 see *id.*, col. 11, lines 59-64

Although Danknick describes a device that, when configured as a list manager, creates and stores a list of devices on the LAN (along with performing other operations such as periodically checking for other list managers), Danknick nowhere describes the operations in the claimed embodiments. Specifically, Danknick nowhere describes (1) a client computer system receiving a multicast message from (2) a second client querying (3) a device and performing an operation in (1) the client computer system when (3) the device has not responded to a predetermined number of queries from (2) the second device.

Because Danknick nowhere describes the claimed embodiments Danknick (and Danknick in combination with Eatough) cannot render the claimed embodiments obvious.⁹ For this reason, Applicant respectfully requests the withdrawal of the rejection of independent claims 1, 9, and 17 under 35 U.S.C. § 103 based on Danknick in combination with Eatough. Applicant further requests the withdrawal of the rejection of any dependent claims in the instant application for the same reason.

⁹ see at least Manual of Patent Examining Procedure (MPEP) § 2141(III) and 2143.01(IV-VI)

CONCLUSION

It is submitted that the application is presently in form for allowance.
Such action is respectfully requested.

Respectfully submitted,

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